

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: VIAGRA (SILDENAFIL CITRATE)
AND CIALIS (TADALAFIL) PRODUCTS
LIABILITY LITIGATION

Case No.: 3:16-md-02691-RS
MDL No. 2691

Case No:

TIMOTHY L. BRUNGARD,

Master Short Form Complaint

Plaintiff,

v.

ELI LILLY AND COMPANY,

Defendant.

Plaintiff, TIMOTHY L. BRUNGARD, incorporates by reference the Plaintiffs' Master Long Form Complaint(s) filed with United States District Court for the Northern District of California in the matter of *In re: Viagra (Sildenafil Citrate) and Cialis (Tadalafil) Products Liability Litigation*. Plaintiff further shows the court as follows:

1. Defendant(s) against whom Complaint is made:

a. ☒ Eli Lilly and Company

b. ☐ Pfizer Inc.

c. ☐ Other (specify Defendant) _____

2. Plaintiff's Full Name:

a. Timothy L. Brungard

3. Name of the party or deceased who ingested Viagra/Revatio (sildenafil citrate) (hereinafter "Viagra") and/or Cialis/Adcirca (tadalafil) (hereinafter "Cialis") and suffered injury, if different than Plaintiff:

a. N/A

4. Name of additional or other Plaintiff, including loss of consortium Plaintiff(s) (i.e. administrator, executor, guardian, conservator):

a. N/A

5. Plaintiff's current city and state of residence:

a. Fountain Hills, Arizona

6. District Court in which venue would be proper absent direct filing:

a. District of Arizona

7. City and state of Plaintiff or Decedent when he/she was diagnosed with melanoma:

a. Fountain Hills, Arizona

8. Approximate dates that the Plaintiff or Decedent ingested Viagra (if applicable):

a. Start date: N/A

b. Stop date: N/A

9. Approximate dates that the Plaintiff or decedent ingested Cialis (if applicable):

a. Start date: 01/11/2015

b. Stop date: 04/20/2016

10. Date(s) that Plaintiff was diagnosed with melanoma which he/she alleges was caused by Viagra and/or Cialis:

a. 06/23/2017

11. Date of death of Decedent, if applicable:

a. N/A

12. Master Complaint Adopted (check one or both):

a. Pfizer Master Complaint

b. X Eli Lilly Master Complaint

13. Counts in the Master Complaint(s) brought by Plaintiff(s):

a. Count 1 (Negligence): X

b. Count 2 (Gross Negligence): X

c. Count 3 (Negligence Per Se): X

20 a. Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiff(s) hereby demand a trial
21 by jury as to all claims in this action: Yes X No

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Respectfully submitted on behalf of the Plaintiff,



Jennifer Liakos (CA SBN 207487)

Hunter J. Shkolnik (*Pro Hac Vice Pending*)

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